

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

LLT MANAGEMENT LLC,

Plaintiff,

-v-

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDOX,

Defendants.

Civil Action No. 4:24-cv-00075

JURY TRIAL DEMANDED

**DECLARATION OF BRITTANY L. LITZINGER IN SUPPORT OF PLAINTIFF LLT
MANAGEMENT LLC'S OPPOSITION TO DEFENDANTS' MOTION TO STAY
DISCOVERY PENDING RESOLUTION OF DEFENDANTS' MOTION TO DISMISS**

I, Brittany Leigh Litzinger, declare as follows:

I am an attorney and an associate with the law firm King & Spalding LLP, counsel for Plaintiff LLT Management LLC (hereafter, “LLT”) in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in support of LLT’s Opposition to Defendants’ Motion to Stay Discovery Pending Resolution of Defendants’ Motion to Dismiss.

1. Attached hereto as **Exhibit A** is a true and correct copy of LLT’s First Set of Requests for Admission to Defendants, served in this case on July 26, 2024.

2. Attached hereto as **Exhibit B** is a true and correct copy of LLT’s First Set of Interrogatories to Defendants, served in this case on July 26, 2024.

3. Attached hereto as **Exhibit C** is a true and correct copy of LLT’s First Set of Requests for Production to Defendants, served in this case on July 26, 2024.

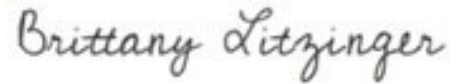
4. Attached hereto as **Exhibit D** is a true and correct copy of Emory TS, Maddox JC, Kradin RL. Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients. *Am J Ind Med.* 2020 Jun;63(6):484-489. doi: 10.1002/ajim.23106. Epub 2020 Mar 16. PMID: 32175619; PMCID: PMC7317550.

5. Attached hereto as **Exhibit E** is a true and correct copy of Judge Henry E. Hudson’s February 2, 2022 Order Denying Motions to Stay Discovery, filed in *Meade v. Hicks*, No. 3:21-cv-00222 (E.D. Va. 2022).

6. Attached hereto as **Exhibit F** is a true and correct copy of Judge Emile A. Henderson III’s October 16, 2023 Order Granting Motion to Stay Discovery in *McCurdy v. Johnson & Johnson*, No. 1:23-cv-00018 (D.V.I. 2023).

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 5, 2024

A handwritten signature in cursive script that reads "Brittany Litzinger". The signature is written in dark ink and is positioned above a horizontal line.

Brittany L. Litzinger